

ILLINOIS COMMERCE COMMISSION

ILLINOIS COMMERCE COMMISSION
ON ITS OWN MOTION

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Docket 00-0182

83 ILL. Admin. Code 460 "Certification
Requirements and Standards of
Service for Meter Service Providers"

CHIEF CLERK'S OFFICE

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ILLINOIS
COMMERCE COMMISSION

**INTERNATIONAL BROTHERHOOD OF ELECTRICAL
WORKERS, AFL-CIO, LOCAL UNION NOS. 15, 51, 702 AND 1306'S
VERIFIED PETITION TO INTERVENE**

NOWCOMES International Brotherhood of Electrical Workers, AFL-CIO, Local Union NOS. 15, 51, 702 and 1306, by their attorneys, and petitions the Illinois Commerce Commission ("Commission") to intervene in the abovementioned proceeding and in support thereof, states:

1. This proceeding was initiated on the Commission's own motion to establish rules for the provision of unbundled metering service particularly with regard to establishing "certification requirements and standards of service for meter service providers."

2. Local Union No. 15, International Brotherhood of Electrical Workers, AFL-CIO, (hereafter "Local 15, IBEW") whose main office is located in Downers Grove, Illinois, is a voluntary, unincorporated Labor Union which is the bargaining representative of employees employed by Commonwealth Edison Company in job classifications who perform meter reading and meter repair work. Local 15, IBEW has a Collective Bargaining Agreement with Commonwealth Edison Company covering wages, hours, fringe benefits, and terms and

conditionsofemploymentfor its members employed by Commonwealth Edison Company.

3 Local Union No. 51, International Brotherhood of Electrical Workers, AFL-CIO, (hereafter"Local51, **IBEW**") whose main office is located in Springfield, Illinois, is a voluntary, unincorporated Labor Union which is the bargaining representative of employees employed by Illinois Power Company in job classificationswho perform meter reading and meter repair work.. Local 51, **IBEW**has a Collective Bargaining Agreement with Illinois Power Company covering wages, hours, fringe benefits, and terms and conditions of employment for its members employed by Illinois Power Company.

4. Local Union No. 51, International Brotherhood of Electrical Workers, AFL-CIO, (hereafter "Local 51, **IBEW**") whose main office is located in Springfield, Illinois, is a voluntary, unincorporated Labor Union which is the bargaining representative of employees employed by Central Illinois Light Company injob classificationswho perform meter reading and meter repairwork.. Local 51, **IBEW**has a Collective Bargaining Agreement with Central Illinois Light Company covering wages, hours, fringe benefits, and terms and conditions of employment for its members employed by Central Illinois Light Company.

5. Local Union No. 702, International Brotherhood of Electrical Workers, AFL-CIO, (hereafter "Local 702, **IBEW**") whose main office is located in West Frankfort, Illinois, is a voluntary, unincorporated Labor Union which is the bargaining representative of employees employed by Ameren-Central Illinois Public Service Company in job classifications who perform meter reading and meterrepairwork.. Local 702, **IBEW** has a Collective Bargaining Agreement with Ameren-Central Illinois Public Service Company covering wages, hours, fringe benefits, and terms and conditions of employment for its members employed by

Ameren-Central Illinois Public Service Company.

6. Local Union No. 1306, International Brotherhood of Electrical Workers, AFL-CIO, (hereafter "Local 1306, IBEW") whose main office is located in Decatur, Illinois, is a voluntary, unincorporated Labor Union which is the bargaining representative of employees employed by Illinois Power Company in job classifications who perform delivery of services related to meter reading and meter repair functions. Local 1306, IBEW has a Collective Bargaining Agreement with Illinois Power Company covering wages, hours, fringe benefits, and terms and conditions of employment for its members employed by Illinois Power Company.

6. International Brotherhood of Electrical Workers, AFL-CIO, Local Union Nos. 15, 51, 702 and 1306 have members who have a direct and substantial interest in the subject matter of this proceeding.

7. No other party to this proceeding can adequately represent the interests of those persons who are members of International Brotherhood of Electrical Workers, AFL-CIO, Local Union Nos. 15, 51, 702 and 1306.

8. International Brotherhood of Electrical Workers, AFL-CIO, Local Union Nos. 15, 51, 702 and 1306 have the legal authority to intervene on behalf of its members in the utility regulatory proceedings.

9. Granting the request of International Brotherhood of Electrical Workers, AFL-CIO, Local Union Nos. 15, 51, 702 and 1306 to intervene will not delay this proceeding.

10. International Brotherhood of Electrical Workers, AFL-CIO, Local Union Nos. 15, 51, 702 and 1306 request that the following persons be placed on the official Service List

in this proceeding:

William H. Starr
Business Manager, Financial Secretary
IBEW Local Union No. 15
133 Butterfield Rd., suite 280
Downers Grove, IL 60515

Dominic Rivara
Business Manager and Financial Secretary
IBEW Local Union No. 51
301 East Spruce Street
Springfield, IL 62703

Christopher T. Hexter
Charles Werner
Schuchat, Cook and Werner
1221 Locust Street., 2nd floor
St. Louis, MO 63103

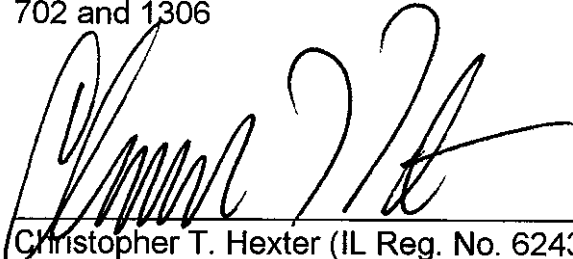
Gary Roan
Business Manager
IBEW Local Union No. 702
106 North Monroe Street
West Frankfort, IL 62896

Kevin Bennett
Business Manager
IBEW Local Union No 1306
363 N. Sims Drive
Decatur. IL 62523

WHEREFORE, International Brotherhood of Electrical Workers, AFL-CIO, Local Union Nos. 15, 51, 702 and 1306 respectfully petitions the Illinois Commerce Commission for leave to intervene in the above-captioned proceeding.

Respectfully submitted,

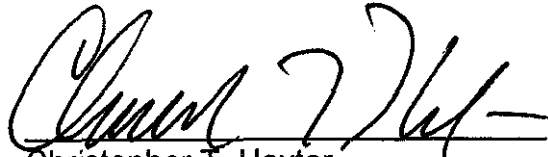
SCHUCHAT, COOK & WERNER
Attorneys for International
Brotherhood of Electrical Workers
AFL-CIO, Local Union Nos. 15, 51,
702 and 1306



Christopher T. Hexter (IL Reg. No. 6243279)
1221 Locust Street, Second Floor
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(314) 621-2626
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VERIFICATION

Christopher T. Hexter, first being duly sworn, deposes and states that he is an attorney for International Brotherhood of Electrical Workers, AFL-CIO, Local Union Nos. 15, 51, 702 and 1306, that he has read the foregoing Petition to Intervene by and knows its contents; and that the statements made in this Petition to Intervene are true and accurate to the best of my knowledge.


Christopher T. Hexter

Signed and sworn to before me this 8th day of March, 2000.


Notary Public

Commission Expires:
159780.WPD 4/16/00



JEANINE L. CROSS
NOTARY PUBLIC—STATE OF MISSOURI
ST. CHARLES COUNTY
MY COMMISSION EXPIRES APR. 16, 2000

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

ILLINOIS COMMERCE COMMISSION
ON ITS OWN MOTION

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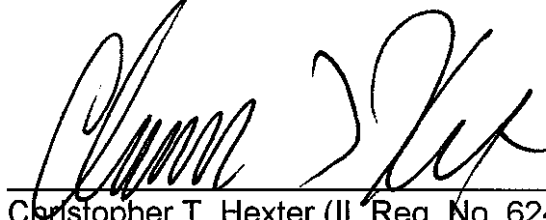
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Service for Meter Service Providers"

NOTICE OF FILING

PLEASE TAKE NOTICE that on this date; March 8, 2000, we have filed with the Chief Clerk of the Illinois Commerce Commission the enclosed Verified Petition to Intervene in the above mentioned proceeding.

Respectfully submitted,
SCHUCHAT, COOK & WERNER
Attorneys for International
Brotherhood of Electrical Workers
AFL-CIO, Local Union Nos. 15, 51,
702 and 1306

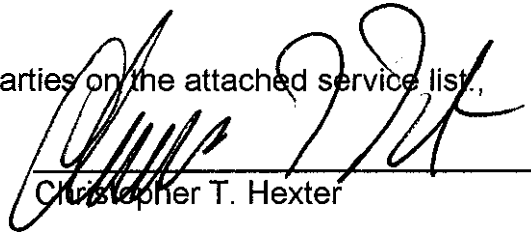


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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of March, 2000, I served copies of the foregoing International Brotherhood of Electrical Workers, AFL-CIO, Local Union Nos. 15, 51, 702 and 1306 's Petition to Intervene by placing a copy thereof in the United States

mail, postage-prepaid to each of the parties on the attached service list,



Christopher T. Hexter

159782.WPD

SERVICE LIST

DOCKET NO. 00-0182

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